

**VERMONT SECRETARY OF STATE****Corporations Division**

MAILING ADDRESS: Vermont Secretary of State, 128 State Street, Montpelier, VT 05633-1104

DELIVERY ADDRESS: Vermont Secretary of State, 128 State Street, Montpelier, VT 05633-1104

PHONE: 802-828-2386

WEBSITE: www.sec.state.vt.us**1. Acknowledgement Information.**

- a. **Name:** Nerissa Rush
- b. **Acknowledgement Address:** 475 Anton Blvd, Costa Mesa, CA, 92626, USA
- c. **Email Address:** nerissa.rush@experian.com
- d. **Phone No:** (714) 830-7613

2. Data Broker Information.

- a. **Name:** Clarity Services, Inc.
- b. **Primary Physical Address:** 15550 Lightwave Drive, Suite 350, Clearwater, FL, 33760, USA
- c. **Primary Email Address:** clarityinfo@experian.com
- d. **Primary Internet Address (URL):** www.clarityservices.com

3. Does the data broker permit a consumer to opt out of the data broker's collection of brokered personal information, opt out of its databases or opt out of certain sales of data? ☒ Yes ☐ No*If so:***a. What was the method for requesting an opt-out?**

Consumers may opt-out via phone, mail or fax.

b. If the opt-out applied to only certain activities or sales, which ones?

The opt-out only applies to the sale of the consumer's information pursuant to Section 604(c)(1)(B) of the Fair Credit Reporting Act in connection with a credit transaction that is not initiated by the consumer (i.e., a "firm offer of credit" or "prescreen offering").

c. Does the data broker permit a consumer to authorize a third party to perform the opt-out on the consumer's behalf?

Yes, a third party can request the opt-out on the consumer's behalf if the opt-out request is accompanied by sufficient evidence that the third-party is authorized to act on behalf of the consumer.

4. Statement specifying the data collection, databases or sales activities from which a consumer may not have opted out during the prior year:

The consumer opt-out only applies to the use of data for prescreen offers of credit pursuant to Section 604(c)(1)(B) of the Fair Credit Reporting Act and does not apply to other uses of data pursuant to the FCRA, Gramm-Leach-Bliley Act or any other use permitted by law.

5. Statement regarding whether the data broker implemented a purchaser credentialing process during the prior year:

All purchasers looking to obtain data from Clarity Services Inc. undergo a robust vetting process in accordance with the Fair Credit Reporting Act (15 U.S.C. § 1681e(a)), Gramm Leach Bliley Act 6802, OFAC and any internal client alert lists prior to the setup, access, and release of data.

6. The number of security breaches that the data broker experienced during the prior year: 0 .

Total number of consumers affected by the breaches: 0 .



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- 7. Where the data broker has actual knowledge that it possesses the brokered personal information of minors, provide a statement detailing the data collection practices, databases, sales activities, and opt-out policies that are applicable to the brokered personal information of minors:**

Clarity does not separately track or flag credit files on minors, and, thus, if Clarity receives a valid inquiry for a consumer credit file on a minor, Clarity will provide a credit report.

- 8. Any additional information or explanation the data broker chooses to provide concerning its data collection practices during the prior year:**

N/A

9. Certification of Annual Registration.

I hereby certify, under penalty of law (13 V.S.A. Ch. 65), as an authorized representative of the data broker, that the all of the above information is accurate.

Alexander Lintner
PRINTED NAME

Alexander Lintner
SIGNATURE

01/31/2019
DATE